

EXHIBIT B

From: Michael N. Impellizeri
Sent: Friday, August 16, 2024 1:02 PM
To: Michael Mule; Gibbs, J. Evan; Gorman, Daniel E.; Nicole Koster; Ken Novikoff; Robert Milman; Colleen O'Neil
Cc: Kent, Paris L.; Adler, Matt; kmulry@FarrellFritz.com; Joseph Labuda
Subject: RE: SiteOne Landscape Supply, LLC v. Giordano et al. (23-cv-02084) - SiteOne's Fourth Rolling Production of Documents

The Vic Defendants also consent to a two-week extension of time –

We have been dealing with an injunction received yesterday, so we will not be serving our supplemental responses until next week. However, I should have an updated hit report on our search terms shortly, and will forward it upon receipt.



Michael N. Impellizeri

Associate

926 RXR Plaza, Uniondale, NY 11556-0926

D 516.357.3118 **T** 516.357.3000 **F** 516.357.3333

Michael.Impellizeri@rivkin.com

www.rivkinradler.com



From: Michael Mule <MichaelMule@mllaborlaw.com>

Sent: Friday, August 16, 2024 12:57 PM

To: Gibbs, J. Evan <Evan.Gibbs@troutman.com>; Gorman, Daniel E. <Daniel.Gorman@troutman.com>; Nicole Koster <NKoster@mllaborlaw.com>; Michael N. Impellizeri <Michael.Impellizeri@rivkin.com>; Ken Novikoff <Ken.Novikoff@rivkin.com>; Robert Milman <rob@mmmlaborlaw.com>; Colleen O'Neil <Colleen@mllaborlaw.com>

Cc: Kent, Paris L. <Paris.Kent@troutman.com>; Adler, Matt <Matt.Adler@troutman.com>; kmulry@FarrellFritz.com; Joseph Labuda <joe@mllaborlaw.com>; Michael Mule <MichaelMule@mllaborlaw.com>

Subject: [EXTERNAL] RE: SiteOne Landscape Supply, LLC v. Giordano et al. (23-cv-02084) - SiteOne's Fourth Rolling Production of Documents

As to your request to extend the deadline, we will consent to an additional two weeks (three weeks from today), to September 6, at this time.

From: Gibbs, J. Evan <Evan.Gibbs@troutman.com>

Sent: Thursday, August 15, 2024 11:53 AM

To: Michael Mule <MichaelMule@mllaborlaw.com>; Gorman, Daniel E. <Daniel.Gorman@troutman.com>; Nicole Koster <NKoster@mllaborlaw.com>; Michael N. Impellizeri <Michael.Impellizeri@rivkin.com>; Ken Novikoff <Ken.Novikoff@rivkin.com>; Robert Milman <rob@mmmlaborlaw.com>; Colleen O'Neil <Colleen@mllaborlaw.com>

Cc: Kent, Paris L. <Paris.Kent@troutman.com>; Adler, Matt <Matt.Adler@troutman.com>; kmulry@FarrellFritz.com

Subject: RE: SiteOne Landscape Supply, LLC v. Giordano et al. (23-cv-02084) - SiteOne's Fourth Rolling Production of Documents

Mike –

We provided updated and additional search parameters with our August 2 correspondence. As we explained in that letter and in our email of August 12, we are finishing our review of the initial 21,000 documents that hit on our original set of terms before moving on to the updated/new terms. We expect to finish the original set this week and will immediately move along to other 4,300 documents that hit on our updated/new terms. We will continue to make rolling productions until we are finished reviewing all responsive documents (which we think will be by the end of the month).

Our deadline to amend the pleadings and add parties is approaching (again) and is currently set for August 23. The Don Defendants just now served their supplemental discovery responses and made another production. The Vic Defendants have still not produced supplemental discovery responses or produced any additional documents since early June. We therefore are going to ask the Court next week to again move the amendment deadline by another month to September 23 since we are in no better position than we were when we made our last request to assess whether SiteOne needs to add parties or claims. Please let us know by tomorrow, August 16, whether Defendants consent to this request.

Thank you.

J. Evan Gibbs

Partner

troutman pepper

Direct: 404.885.3093 | Mobile: 229.425.3745 | Internal: 11-3093

evan.gibbs@troutman.com

From: Michael Mule <MichaelMule@mllaborlaw.com>

Sent: Wednesday, August 14, 2024 7:48 PM

To: Gorman, Daniel E. <Daniel.Gorman@troutman.com>; Nicole Koster <NKoster@mllaborlaw.com>; Michael N. Impellizeri <Michael.Impellizeri@rivkin.com>; Ken Novikoff <Ken.Novikoff@rivkin.com>; Robert Milman <rob@mmmlaborlaw.com>; Colleen O'Neil <Colleen@mllaborlaw.com>

Cc: Gibbs, J. Evan <Evan.Gibbs@troutman.com>; Kent, Paris L. <Paris.Kent@troutman.com>; Adler, Matt <Matt.Adler@troutman.com>; kmulry@FarrellFritz.com; Michael Mule <MichaelMule@mllaborlaw.com>

Subject: RE: SiteOne Landscape Supply, LLC v. Giordano et al. (23-cv-02084) - SiteOne's Fourth Rolling Production of Documents

CAUTION: This message came from outside the firm. DO NOT click links or open attachments unless you recognize this sender (look at the actual email address) and confirm the content is safe.

For clarification, do you have updated search parameters? Or were the search parameters that were provided on August 2 used in connection with the August 9 production? Thank you.

From: Gorman, Daniel E. <Daniel.Gorman@troutman.com>

Sent: Friday, August 9, 2024 3:27 PM

To: Nicole Koster <NKoster@mllaborlaw.com>; Michael N. Impellizeri <Michael.Impellizeri@rivkin.com>; Ken Novikoff <Ken.Novikoff@rivkin.com>; Michael Mule <MichaelMule@mllaborlaw.com>; Robert Milman <rob@mmmlaborlaw.com>; Colleen O'Neil <Colleen@mllaborlaw.com>

Cc: Gibbs, J. Evan <Evan.Gibbs@troutman.com>; Kent, Paris L. <Paris.Kent@troutman.com>; Adler, Matt <Matt.Adler@troutman.com>; kmulry@FarrellFritz.com

Subject: SiteOne Landscape Supply, LLC v. Giordano et al. (23-cv-02084) - SiteOne's Fourth Rolling Production of Documents

Nicole and Michael:

SiteOne's fourth rolling production of documents, Bates stamped SITEONE_00478812 - SITEONE_00479040, can be downloaded using the following link: <https://emerge.sharefile.com/d-s65383ecd24564bc292291a6fe56d1ec7>. A password will be provided in a separate e-mail shortly.

Thank you,
Daniel

Daniel E. Gorman*

Associate

Direct: 212.704.6333 | Internal: 13-6333

daniel.gorman@troutman.com

troutman pepper

875 Third Avenue
New York, NY 10022
troutman.com

*Licensed to practice law in New York and New Jersey.

Troutman Pepper is a Mansfield Certified Plus Firm

This e-mail (and any attachments) from a law firm may contain legally privileged and confidential information solely for the intended recipient. If you received this message in error, please notify the sender and delete it. Any unauthorized reading, distribution, copying, or other use of this e-mail (and attachments) is strictly prohibited. We have taken precautions to minimize the risk of transmitting computer viruses, but you should scan attachments for viruses and other malicious threats; we are not liable for any loss or damage caused by viruses.